

**FILED**

MAR 29 2022

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**RECEIVED**

MAR 29 2022

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Malibu Media

v.

William Mullins,

and

Wells Fargo Bank N.A.,

Third Party Citation Respondent.

)

)

)

)

) No. 18 C 6447

)

) Judge: Thomas M. Durkin

)

)

**ANSWER OF THIRD PARTY CITATION RESPONDENT**

I, JULIA LOPEZ (name), the AGENT (title) of  
Respondent, WELLS FARGO BANK (entity's legal name), state under penalty  
of perjury as follows: the Respondent is a CORPORATION (e.g., partnership, corporation,  
etc.) organized under the laws of the State of DELAWARE.

On MARCH 3, 2021, Respondent was served with the Third Party Citation to  
Discover Assets. With respect to any one or all of the judgment debtors, Malibu  
Media, LLC, ZO Digital, LLC, and Colette Pelissier, on the day Respondent was  
served with the Citation, Respondent had in its possession or control the following  
property of MALIBU MEDIA LLC (name of judgment debtor):

**1. Financial Accounts****Account 1**

ACCOUNT CLOSED

Account type: \_\_\_\_\_

Account No.: \_\_\_\_\_

Amount: \$ \_\_\_\_\_

Amount withheld: \$ \_\_\_\_\_

**Account 2**

Account type: \_\_\_\_\_

Account No.: \_\_\_\_\_

Amount: \$ \_\_\_\_\_

Amount withheld: \$ \_\_\_\_\_



**Account 3**

Account type: \_\_\_\_\_

Account No.: \_\_\_\_\_

Amount: \$ \_\_\_\_\_

Amount withheld: \$ \_\_\_\_\_

**Account 4**

Account type: \_\_\_\_\_

Account No.: \_\_\_\_\_

Amount: \$ \_\_\_\_\_

Amount withheld: \$ \_\_\_\_\_

**2. Safety Deposit Box**

Box No.: NO SAFE DEPOSIT BOX

Amount: \$ \_\_\_\_\_

Owners other than the judgment debtor: \_\_\_\_\_

**3. Detail other personal property in the respondent's possession or control:**

**4. Are there prior garnishments or other court-ordered withholdings which are presently in effect including, but not limited to child support and alimony?**

Yes \_\_\_ No X

If the answer is yes, describe below.

**5. Does the Respondent have custody, control, or possession of any property, other than accounts, safety deposit boxes or other personal property, now owed or to be paid in the future, in which the judgment debtor has an interest?**

Yes \_\_\_ No X

If yes, please describe below (continue on additional sheets if necessary):

**6. Check and complete the applicable line below if you deny that you hold property subject to this Citation to Discover Assets.**



— The Respondent has the following objections, defenses, or set-offs to the United States= right to apply Respondent's indebtedness to defendant to the United States= claim:

— On the date the Respondent was served with the Citation to Discover Assets, Respondent was not indebted or under liability to the defendant, and/or did not have in its possession or control any assets, income or other property belonging to Respondent, or in which the defendant has an interest.

7. The original Answer must be delivered in person or sent by firstclass mail to The Peacock Law Group, 161 N. Clark Street, Suite 1600, Chicago, Illinois 60604.

8. The Respondent mailed a copy of this Answer by first-class mail to the judgment debtor/account holder, \_\_\_\_\_ at \_\_\_\_\_

**VERIFICATION**

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury that the foregoing is true and correct.

Executed this 22 day of March 2022.

\_\_\_\_\_  
(Please print and sign name.) JULIA LOPEZ, AGENT  
Phone No. 480/724-2000 3/22/2022

WELLS FARGO BANK  
PO BOX 29779  
PHOENIX AZ 85038

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
219 S DEARBORN ST  
CHICAGO IL 60604**

**Legal Support**  
PO Box 29779  
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